

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

NATALIE SOTO,

Plaintiff,

v.

WENDELL HOLMES, JR.,

Defendant.

Civil Action No. 1:24-cv-02911-SDG

DEFENDANT'S MOTION TO SANCTION PLAINTIFF AND HER COUNSEL FOR INVASION
OF PRIVACY

COMES NOW, Wendell Holmes Jr., the Defendant in the above-captioned case, representing myself pro se, and respectfully submits this Motion to Sanction the Plaintiff and her Counsel for Invasion of Privacy. In support of this motion, I state as follows:

I. INTRODUCTION

1. I am the Defendant in this matter, appearing without an attorney.
2. During the discovery process, it has come to light that the Plaintiff and her counsel have engaged in the unauthorized dissemination of intimate images belonging to a third party, herein referred to as "Jane Doe," without her consent.

II. FACTUAL BACKGROUND

1. The Plaintiff, Natalie Soto obtained intimate images of Jane Doe from Dawn Douglas.

2. These images were subsequently shared by the Plaintiff with her attorney.

3. The Plaintiff's attorney then submitted these images to the Court Clerk as part of the discovery materials, which were also provided to me, the Defendant.

4. At no point was Jane Doe's consent obtained for the sharing or distribution of these intimate images.

III. LEGAL ARGUMENT

1. Violation of Privacy Rights:

- The non-consensual dissemination of intimate images is a violation of privacy rights and is prohibited under both civil and criminal law. According to the Department of Justice, "The sharing of intimate images or videos of someone without their consent violates their privacy and can cause harm. It can also be against the law."

2. Unlawful Disclosure by Legal Counsel:

- Attorneys have an ethical obligation to protect the confidentiality and privacy of individuals. The unauthorized sharing of intimate images by the Plaintiff's counsel constitutes a breach of this duty and may be subject to legal penalties.

3. Precedent for Legal Action:

- Courts have recognized the unauthorized dissemination of intimate images as grounds for legal action. For instance, in a recent case, a court reinstated a claim against a plastic surgeon who allegedly shared photos of a patient without consent.

IV. REQUEST FOR RELIEF

Based on the foregoing, I respectfully request that the Court

1. Sanction the Plaintiff and her Counsel:

- Impose appropriate sanctions for the unauthorized dissemination of Jane Doe's intimate images, including but not limited to monetary penalties and referral to the appropriate professional disciplinary bodies.

2. Order the Immediate Cessation of Dissemination:

- Issue an injunction preventing further distribution of Jane Doe's intimate images.

3. Order the Destruction of Unauthorized Materials:

- Mandate the destruction of all copies, both physical and digital, of Jane Doe's intimate images that were obtained and disseminated without her consent.

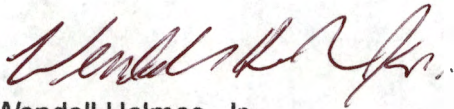
4. Award Attorney's Fees and Costs:

- As a pro se litigant, I request reimbursement for any costs incurred in bringing this motion before the Court.

V. CONCLUSION

The unauthorized dissemination of Jane Doe's intimate images by the Plaintiff and her counsel is a serious violation of privacy rights and legal ethics. Such actions not only harm the individual whose privacy has been invaded but also undermine the integrity of the judicial process. I respectfully urge the Court to grant the relief requested to address this misconduct appropriately.

Respectfully submitted,



Wendell Holmes, Jr.

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March 24, 2025

Pro Per (Self-Represented Defendant)

Certificate of Service

I hereby certify that a true and correct copy of the foregoing Motion to Sanction Plaintiff and Her Counsel for Invasion of Privacy has been served upon the Plaintiff's attorney, Joseph Weeks, via [Certified Mail / Approved Electronic Filing System], on this 24th day of March, 2025.

A handwritten signature in dark ink, appearing to read "Wendell Holmes Jr.", written in a cursive style.

Wendell Holmes Jr.